

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Todd Rose

(b) County of Residence of First Listed Plaintiff Delaware
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Arthur D. Goldman, Law Office of Arthur D. Goldman,
LLC, P.O. Box 115, Paoli, PA 19301, 484-343-2856

DEFENDANTS

City of Chester

County of Residence of First Listed Defendant Delaware
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question
(U.S. Government Not a Party)
☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input checked="" type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. Sections 1201, et seq.

Brief description of cause:
Police office subject to disability discrimination

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
250,000

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

August 15, 2024

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 918 Porter Street, Chester Township, PA 19013

Address of Defendant: 1 Fourth Street, Chester, PA 19013

Place of Accident, Incident or Transaction: Chester, PA

RELATED CASE IF ANY:

Case Number: _____ Judge: _____ Date Terminated _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|--|------------------------------|-----------------------------|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit Pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier Numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se case filed by the same individual? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☐ is not related to any now pending or within one year previously terminated action in this court except as note above.

DATE: _____

Attorney-at-Law (Must sign above)

Attorney I.D. # (if applicable)

Civil (Place a ☒ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FEELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☒ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☐ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. All Other Federal Question Cases. (Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: (Please specify) _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration)

I, Arthur D. Goldman, counsel of record or pro se plaintiff, do hereby certify:



Pursuant to Local Civil Rule 53.2 § 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:



Relief other than monetary damages is sought.

DATE: 8/15/24


Attorney-at-Law (Sign here if applicable)

56983 (PA)
Attorney ID # (if applicable)

NOTE: A trial de novo will be a jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

v.

CIVIL ACTION

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ☒

8/15/24
Date

Arthur D. Goldman
Attorney-at-law

Todd Rose
Attorney for
agoldman@arthurgoldmanlaw.com
E-Mail Address

484-343-2856
Telephone

610-296-7730
FAX Number

JURISDICTION AND VENUE

3. This action arises under 28 U.S.C. §1331 which provides for original jurisdiction of Plaintiff's claims arising under the laws of the United States and over actions to recover damages and to secure equitable and other relief under the appropriate governing statutes.

4. Jurisdiction over the federal claims is invoked pursuant to 28 U.S.C. §1343(4) and 29 U.S.C. §216(b), and over the state law claims pursuant to the doctrine of pendant jurisdiction.

5. This Court has jurisdiction over Plaintiff's state claims pursuant to its supplemental jurisdiction as codified at 28 U.S.C. §1367.

6. Plaintiff has exhausted all administrative remedies, having filed a timely complaint of disability discrimination and retaliation on with the Equal Employment Opportunity Commission ("EEOC") and with the Pennsylvania Human Relations Commission ("PHRC"), Charge Number 530-2024-02397 and has taken all other steps necessary to bring this action before this Court.

7. The EEOC was not able to resolve the controversy and issued a "right to sue" letter to the Plaintiff, dated May 17, 2024, and received May 21, 2024, informing and advising the Plaintiff that it was unable to resolve the controversy as described to it and that it was not prepared to take further efforts.

8. The Plaintiff has timely filed this action within the proscribed ninety days following receipt of the "right to sue" letter which was dated May 17, 2024, and received May 21, 2024. Venue is proper pursuant to 42 U.S.C. §1391(b).

9. Declaratory, injunctive and equitable relief are sought pursuant to the Americans with Disabilities Act, 42 U.S.C. §§12101 et seq. ("ADA"), and the Pennsylvania Human Relations Act ("PHRA"), 43 P.S. §§951, et seq.

10. Compensatory and punitive damages are sought pursuant to the Americans with Disabilities Act, 42 U.S.C. §§12101 et seq. (“ADA”), and the Pennsylvania Human Relations Act (“PHRA”), 43 P.S. §§951, et seq; and other damages are sought, including but not limited to back pay and front pay and other lost benefits.

11. Costs and attorneys’ fees are sought pursuant to Americans with Disabilities Act, 42 U.S.C. §§12101 et seq. (“ADA”), and the Pennsylvania Human Relations Act (“PHRA”), 43 P.S. §§951, et seq.

PARTIES

12. Plaintiff Todd Rose is a 51 year-old adult male residing at 918 Porter Street, Chester Township, PA 19013, with a date of birth of December 21, 1972.

13. Defendant The City of Chester was founded in Norristown, Pennsylvania, United States and is located in Montgomery County, Pennsylvania, is one of 29 intermediate units formed by the Pennsylvania General Assembly in 1971 to provide support to local school districts and has its principal location at 1 Fourth Street, Chester, PA 19013.

FACTUAL ALLEGATIONS

General Facts and Background

14. Officer Rose has been a police officer since 2004, having worked at the Transportation Security Agency previously, and was hired as a “Patrol Officer” on September 22, 2004 and has continued since with the same title.

15. Since April 13, 2020, Officer Rose has been out on medical leave as a result of injuries sustained while working for Chester.

16. Specifically, on that date, Officer Rose was injured following a crash during a high speed vehicular chase for a suspect who was eventually apprehended with \$30,000.00, sustaining a concussion, a herniated disc in his neck, and sciatica and lower back problems.

17. Officer Rose's medical disabilities are well-supported by medical documentation.

18. Officer Rose was hired at a salary of approximately \$38,000.00 in 2004 and has a current salary of \$60,000.00 but with overtime and other compensation and if a corporal, over \$115,000.00 annually.

19. Throughout his nearly twenty (20) years of employment, Officer Rose has received consistently satisfactory evaluations.

20. At some time in or around May 2021, Officer Rose became aware that there were three corporal vacancies which were going to be posted, and which he had the opportunity to submit a bid for promotion.

21. On July 30, 2021, Officer Rose took the civil service exam and passed.

22. When Officer Rose took the civil service exam, there were three other applicants, and his scores put him in third place out of the four.

23. In or around February 2022, after applying for the promotion, Officer Rose received what he thought was a personal phone call, from the Chester Chief of Police, Steven Gretskey, who seemed concerned and asked Officer Rose how he was progressing with his recovery.

24. In response, Officer Rose explained that he wanted to get back to work, however he would possibly need a neck operation.

25. Roughly three or four weeks later, Chief Gretskey he called Officer Rose back, and while Officer Rose was on a speaker phone, Chief Gretskey asked if Officer Rose still wanted to be a corporal or detective.

26. Chief Gretskey continued by telling Officer Rose that he could just place him on a special detail when he returned to work, seemingly dismissing the possibility of Officer Rose getting the promotion.

27. In response, Officer Rose explained he was definitely interested in the corporal promotion.

28. Officer Rose was stunned when Chief Gretskey replied, “Well, we have to at least interview you,” implying that Officer Rose did not really have a chance for the promotion because of his injuries.

29. On March 15, 2022, while in the interview for the promotion, the same Chief of Police, Steven Gretskey, made inquiries into Officer Rose’s medical condition, and asked him if he was scheduled for any surgeries; this was said in front of the Mayor, T. Kirkland, another officer, Major Katrina Blackwell, and a city clerk Candice Thompson.

30. These were unscheduled and additional questions, and upon further investigation, Officer Rose found out that no other candidates were asked any medical-related or disability-related questions.

31. After the interview, Officer Rose recalled the prior phone call in which Chief Gretskey insinuated that he was forced to go through with the process but that Officer Rose would probably not be promoted.

32. It was at this point that Officer Rose knew that he was not being truly considered for the promotion.

33. On around May 16, 2022, Officer Rose was then moved from third out of four on the list of candidates and placed at fourth out of four because the other three candidates were all promoted ahead of him.

34. On April 23, 2023, almost a year later, one of the other corporals was promoted to sergeant, leaving a corporal/detective position vacant.

35. Historically, Officer Rose or any other candidate would then be promoted the same day to the vacant corporal position, as Officer Rose had seen this happen dozens of times throughout his years of service.

36. Unfortunately, and unexpectedly, Officer Rose was not called or offered any promotion for the vacant position.

37. In early May 2023, Officer Rose then contacted his Union President, Sergeant Jonathan Ross, who agreed that Officer Rose should have been immediately promoted and should not be held back as a result of any long-term disability.

38. Officer Rose's union, the Fraternal Order of Police, filed a grievance and attempted to get him his due promotion, as he was the only patrolman who was qualified to be promoted.

39. Shockingly, the City of Chester and Chief Gretskey denied the grievance.

40. Later, in September 2023, the Union met with the receiver for the city (appointed by state) and city employees to go over the grievances /arbitrations.

41. On September 23, 2023, in City Council chambers, during Officer Rose's grievance review, Chief Gretskey stated that he was not promoting an injured person and that he needed people that were currently on the street (i.e. not currently disabled).

42. There was no effort whatsoever to make reasonable accommodations for Officer Rose.

43. As of the current date, Officer Rose was denied the promotion despite being the only officer employed who was qualified for the position, with several positions open.

44. This was a clear instance of retaliation against Officer Rose.

COUNT I

VIOLATION OF THE AMERICANS WITH DISABILITIES ACT **42 U.S.C. §§12101 *et seq.***

45. Plaintiff hereby incorporates by reference paragraphs 1 through 44 above as though fully set forth herein.

46. Defendant failed to make reasonable accommodations of Plaintiff's disability, even though his disability did not prevent him from performing the essential functions of many positions with Defendant.

47. Defendant's responses to Plaintiff's demonstrated disabilities were to refuse to promote him to a position for which he has clearly qualified and to in fact retaliate against him by refusing another opportunity in retaliation for his filing a grievance based on allegations of disability discrimination.

48. After Plaintiff communicated to Defendant his intention to file a charge of discrimination with the EEOC, Chester has continued to refuse to promote Officer Rose in retaliation against him.

49. The willful actions of Defendant and its employees in discriminating against Plaintiff were part of a pattern and practice of disability discrimination on the part of Defendant in violation of the ADA.

50. The act of punishing Plaintiff following his filing of a grievance, was an illegal retaliation in violation of the ADA.

51. As a result of the willful and unlawful actions of the Defendant, the Plaintiff has been caused to suffer a severe loss of professional status and reputation in the community of her peers.

52. As a result of the willful and unlawful actions of Defendant, Plaintiff has been caused to suffer serious losses of pay, benefits and other employee remunerations, an undeserved and painful diminution of his ability to provide himself and his family with the earned rewards of excellence in his career of loyalty and effort on behalf of Defendant, emotional distress and humiliation, and a loss of life's pleasures.

53. Defendant violated the Americans with Disabilities Act, 29 U.S.C. §§621 *et seq.*, in that it discriminated and retaliated against Plaintiff on account of his disability.

COUNT II

VIOLATION OF THE PENNSYLVANIA HUMAN RELATIONS ACT **43 P.S. §§955 *et seq.***

54. Plaintiff hereby incorporates by reference paragraphs 1 through 53 above as though fully set forth herein.

55. The PHRA prohibits discrimination and retaliation against individuals on the basis of disability.

56. Defendant violated the provisions of the Pennsylvania Human Relations Act, 43 P.S. §§955 *et seq.*, in that it discriminated against Plaintiff on account of his disabilities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Todd Rose demands judgment in his favor and against Defendant City of Chester as follows:

(a) Enter a declaratory judgment that the Defendant's acts, policies, practices and procedures complained of herein have violated and continue to violate the rights of the Plaintiff as secured to him by federal and state legislative enactments;

(b) Require the Defendant to promote the Plaintiff to the position for which he was qualified prior to the discrimination, and to give the Plaintiff full wages and benefits commensurate with that position;

(c) Award to the Plaintiff past and future damages for loss of income, growth opportunities and all benefits denied him due to the improper and unlawful actions of the Defendant;

(d) Award to the Plaintiff damages in compensation for his emotional distress, humiliation, loss of reputation and status in the community of his peers, and the loss of his ability to provide himself and his family with the rewards of his years of excellence in his chosen profession;

(e) Grant to the Plaintiff liquidated damages as allowed pursuant to the ADA;

(f) Grant to the Plaintiff costs, disbursements and reasonable attorneys' fees as allowed under the ADA; and

(g) Grant to the Plaintiff such additional relief as the Court deems necessary and proper under the circumstances.

Respectfully submitted,


A handwritten signature in black ink, appearing to read 'Arthur D. Goldman', is written over a horizontal line.

Law Office of Arthur D. Goldman, LLC
By: Arthur D. Goldman, Esquire
Attorney I.D. No. 56983
Attorney for Plaintiff Todd Rose
P.O. Box 115
Paoli, PA 19301

Dated: August 15, 2024

CERTIFICATION

I, Arthur D. Goldman, Esquire, attorney for Plaintiff Todd Rose, pursuant to 28 U.S.C. §1746, hereby certify under penalty of perjury under the laws of the United States of America that the foregoing Complaint is true and correct to the best of my knowledge, information and belief.



Arthur D. Goldman, Esquire

Dated: August 15, 2024